

Richard J. Wotipka
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Honorable Timothy W. Dore
Chapter 13
Hearing Date: December 5, 2018
Hearing Time: 9:30 am
Response Date: November 28, 2018

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re:

LUU LE,
Debtor(s).

)
) No. 18-13536
)
) DECLARATION OF COUNSEL IN
) REPLY TO TRUSTEE'S OBJECTION
) TO MOTION FOR ORDER
) AUTHORIZING WITHDRAWAL
) OF COUNSEL

Richard J. Wotipka, under penalty of perjury, hereby declares as follows:

1. I am the attorney of record for the debtor Luu Le in the above caption Chapter 13 case. I have personal knowledge of the following facts and am competent to testify regarding the same.

2. At the initial 341 meeting in this case, the staff attorney from the Trustee's office requested documents and information from the debtor and continued the 341 meeting to allow time for the debtor to produce the information/documents requested prior to the continued 341 meeting.

3. Immediately following the initial 341 meeting I sent the debtor correspondence outlining the information and documentation requested by the trustee's office and requesting that he provide it to me as soon as possible.

4. I never received any responsive documents or information from the debtor prior to the continued 341 meeting, and never received any communication from the debtor of any kind prior to the continued 341 meeting. I appeared at the continued 341 meeting. The debtor did not appear at the continued 341 meeting, and failed to provide any notice that he would not be appearing or any explanation for his failure to appear.

DECLARATION - 1

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1 5. I have received no communication from the debtor following his initial
2 341 meeting. After the debtor failed to provide the requested documents/information,
3 failed to appear at his continued 341 meeting and failed to communicate with me in any
4 way regarding what was going on with his situation, I checked the Trustee's ledgers,
5 which indicated the debtor had also failed to make any plan payment, well over a month
6 after the filing of the case.

7 6. I cannot help a debtor who refuses to help himself, refuses to meet the
8 obligations required of a Chapter 13 debtor, and refuses to communicate with me. There
9 is no point in my wasting time trying to help a debtor who refuses to be helped. .
10
11

12 Dated: November 14th, 2018

By: S/Richard J. Wotipka
Richard J. Wotipka